

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:17CR00308
	:	
Plaintiff,	:	
	:	JUDGE JOHN R. ADAMS
-vs-	:	
	:	
NATASHA JOHNSON,	:	<u>DEFENDANT'S MOTION TO</u>
	:	<u>CONTINUE SENTENCING</u>
Defendant.	:	<u>DATE</u>

Natasha Johnson moves to continue her sentencing date, currently scheduled for October 3, so that she can undergo her scheduled annual neurological examination. These tests are necessary for her medical treatment and for the Court to have an accurate picture of her current health condition, which will be the subject of a motion for downward departure in accordance with her plea agreement.

Ms. Johnson suffers from sarcoidosis, an inflammatory disease in which abnormal masses or nodules (called granulomas) form in certain organs of the body. Granulomas formed in Ms. Johnson's eyes, brain, and other organs throughout her body.

At age 19, Ms. Johnson's sarcoidosis rendered her blind. Through intravenous and oral courses of steroids over the following months, she regained vision in her right eye, but only partial vision in her left eye. She has been treated with steroids off and on since then, although doctors try to treat her condition with non-steroidal anti-inflammatory medications when possible because of the long-term side effects of steroids. When her condition flares up, Ms. Johnson suffers headaches, blurry vision, significant pain and fatigue, and occasional memory loss.

As part of her ongoing treatment, Ms. Johnson undergoes blood draws every eight weeks to monitor her condition and side effects, and a neurological examination every year to check how her sarcoidosis is currently affecting her eyes and brain. Her doctors use these tests to adjust Ms. Johnson's treatment and ensure that she is not in danger of serious complications. Ms. Johnson's next MRI is scheduled for October 11, with her annual neurological exam to follow once the test results are in.

As part of her plea agreement, Ms. Johnson reserved the right to argue for a two-level downward departure for her medical condition under Guidelines § 5H1.4. R. 10, Plea Agreement ¶ 16. Ms. Johnson's sentencing hearing is currently scheduled for October 3.

Ms. Johnson respectfully requests that the Court continue her sentencing hearing until after her doctors receive the results of her upcoming neurological exam and adjust her treatment accordingly. This information is necessary not only for her ongoing health, but for the Court to accurately assess her request for a downward departure and fix appropriate sentencing conditions and recommendations to address her medical needs.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
Ohio Bar No. 0051928

s/Debra Kanevsky Migdal
Debra Kanevsky Migdal
Ohio Bar No. 0058762
Assistant Federal Defender
Akron Centre Plaza
50 S. Main Street, Ste. 700
Akron, OH 44308
Phone: 330-375-5739
Fax: 330-375-5738
E-mail: debra_migdal@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2018, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/Debra Kanevsky Migdal
Debra Kanevsky Migdal
Assistant Federal Defender